REMARKS

Applicant respectfully requests further examination and reconsideration in view of the instant amendment and response. Claims 1-23 remain pending in the case. Claims 1, 4, 5, 7, 9, 11-13, 15, 17 and 23 are amended herein. New Claims 24-40 have been added. No new matter has been added.

35 U.S.C. §102(e)

Claims 1- 23 stand rejected under 35 U.S.C. §102(e) as being anticipated by United States Patent 6,353,848 by Morris, hereinafter referred to as the "Morris" reference. Applicant has reviewed the cited reference and respectfully submits that the present invention as recited in Claims 1-23 is not anticipated by Morris.

Applicant respectfully directs the Examiner to independent Claim 1, as amended, which recites that an embodiment of the present invention is directed to (emphasis added):

> A method of operating a plurality of types of consumer electronic devices interconnected to form a network, said method comprising ~~the steps of:~~
>
> configuring a resource manager of said network with an access policy during network initialization wherein said access policy dictates a condition under which a particular service request is permissible to a user;
>
> receiving a service request indicating an identity of a user;
>
> based on said identity, said resource manager determining whether said service request violates said access policy;
>
> provided said service request is permissible, said resource manager determining whether resources of said

network necessary for carrying out said service request are available; and

provided said resources necessary for carrying out said service request are available, said resource manager transmitting control signals to said network causing said plurality of types of consumer electronic devices to carry out said service request.

Independent Claims 9 and 17 recite a similar limitation. Claims 2-8 which depend from independent Claim 1, Claims 10-16 which depend on independent Claim 9, and Claims 18-23 which depend from independent Claim 17 provide further recitations of the features of the present invention.

Morris and the claimed invention are very different. Applicant understands Morris to teach a method for accessing a digital image capture unit over a communication network. In effect, Morris teaches a method for remotely accessing a digital camera over a network. More particularly, Morris teaches a method for providing access to a digital camera in response to a validated request for access.

Morris does not anticipate the claimed embodiments of the invention because Morris teaches providing access to a digital camera based on authentication information (e.g., a valid user name and password). Embodiments of the claimed invention are directed towards a method for operating a plurality of different types of consumer electronic devices interconnected to form a network, wherein access to the plurality of different types of consumer electronic devices in based on an access policy. In

particular, Claims 1, 9 and 17, recite the limitation "wherein said access policy dictates a condition under which a particular service request is permissible to a user." As described in the present application, upon receiving a service request, it is determined whether the requested service is permissible by an access policy (page 5, lines 24-26).

Specifically, the claimed embodiments of the present invention check a received service request for a violation of an "access policy." Access may be granted to a particular electronic device based on the particular service request when compared to the access policy. Thus, access to a particular electronic device may or may not be granted to a particular user based on the particular service request. For example, the access policy may be structured such that rated R content cannot be played on a television attached to the network between the hours of 5:00 AM and 9:00 PM (page 6, lines 18-20). Accordingly, a television of the network is still operable for viewing between 5:00 AM and 9:00 PM. However, whether particular content can be presented depends on the particular service request.

In contrast, Morris discloses an executable program that allows complete access to a digital camera based on authorization information. A connection request is first received from a client. The client requests access to a specific camera (col. 12, lines 1-6). In particular, once the authentication information is validated (col. 12, lines 38-51), "a client using Web browser 121

or a program of similar function has direct, remote access to camera 300 via executable program 700 in Web server 161" (col. 12, lines 52-59; emphasis added). In other words, once the authentication information is validated, the client has full access to the digital camera, as described in co. 12, line 60 through col. 13, line 29. Applicant respectfully submits that Morris does not teach an access policy under which a particular service request is permissible, as claimed. On the contrary, by teaching permitting direct access to the digital camera, Morris teaches away from such a configuration.

Furthermore, Morris also does not anticipate the claimed embodiments of the invention because the actions taught in Morris occur in a reverse order as those in the claimed embodiments. Applicant respectfully asserts that Morris in particular does not teach, disclose, or suggest provided a service request is permissible, the resource manager determining whether resources of the network necessary for carrying out the service request are available, as claimed. In particular, embodiments of the present invention provide that a service request is received (step 710 of Figure 7; page 15, lines 10-15), and that a determination is made as to whether the service request violates an access policy (step 740 of Figure 7; page 15, line 24 through page 16, line 3). Once it is determined that no policy is violated, and that the service request is permissible, the resource manager checks availability of the resources (step 750 of Figure 7; page 16, lines 16-20).

In contrast, Morris discloses an executable program in which it is first determined whether a camera is available, and then determines whether access to the camera is allowed. Specifically, in step 750 of Figure 7 (col. 12, lines 33-37), the executable program determines if the camera is registered. Then, if the camera is registered, in step 760 of Figure 7 (col. 12, lines 38-51), it is determined whether a user is allowed to access the camera. In particular, it is necessary to first determine whether the camera is available, because the authentication information is tied to the camera, as described above. Applicant respectfully asserts that Morris in particular does not teach, disclose, or suggest provided a service request is permissible, the resource manager determining whether resources of the network necessary for carrying out the service request are available, as claimed. On the contrary, Morris teaches away from such a configuration, as Morris requires that a camera be available prior to determination of whether a user may access the camera.

Moreover, Morris does not anticipate the claimed embodiments of the invention because Morris does not teach using collected data to control access to a digital camera. Claim 4, and similarly Claims 12 and 20, further recites the limitation of "retrieving said record of activities of said user from a log database provided said access policy is dependent on user activities." Applicant respectfully asserts that Morris in particular does not teach, disclose, or suggest this limitation. As described above, when a service request is received, an access policy for the user is accessed to determine whether the

service request is permissible. Embodiments of the present invention provide for checking a user-activities register to determine whether an access policy is violated (step 735 of Figure 7; page 16, lines 5-10). For example, this feature allows for monitoring a particular user's television usage and restricting access to a television if the user has exceeded their hourly limit.

In contrast, Morris discloses an executable program on a Web server that allows for accessing and managing a plurality of cameras. The executable program may be configured to compile data regarding interactions between users and cameras. However, Morris is silent as to the usage of this data. In particular, Morris does not teach, disclose or suggest using the data in conjunction with an access policy. Furthermore, Morris does not teach, disclose or suggest using the data to determine whether a client is allowed access to a camera.

In addition, Morris does not anticipate the claimed embodiments of the invention because Morris does not teach content information associated with different types of consumer electronic devices. Claims 6, 14 and 22 further recite the limitation "wherein said resources comprise hard resources and soft resources, and wherein said hard resources comprise said plurality of different types of consumer electronic devices and wherein said soft resources comprise content information accessible by said plurality of different types of consumer electronic devices." Applicant respectfully asserts that Morris in

particular does not teach, disclose, or suggest this limitation. Hard resources, for example, refer to electronic devices of a home network, such as a television or a video cassette recorder, and soft resources, for example, refer to anything that is not a hard resource, such as a memory address space or a television channel.

In contrast, Morris discloses an executable program that allows for accessing and managing a plurality of cameras via a communication network. In particular, Morris only discloses a single type of consumer electronic device, a digital camera. Furthermore, Morris only discloses soft resources associated with a digital camera, specifically images and data to control the digital camera. Morris does not teach, disclose or suggest soft resources that can be accessible by different types of consumer electronic devices.

Applicant respectfully asserts that nowhere does Morris teach, disclose or suggest the present invention as recited in independent Claims 1, 9 and 17, and that these claims are thus in a condition for allowance. Therefore, Applicant respectfully submits that Morris also does not show or suggest the additional claimed features of the present invention as recited in Claims 2-8 which depend from independent Claim 1, Claims 10-16 which depend from independent Claim 9, and Claims 18- 23 which depend from independent Claim 17. Therefore, Applicant respectfully submits that Claims 2-8, 10-16 and 18-23 overcome the Examiner's basis for rejection under 35 U.S.C. § 102(e),

and are in a condition for allowance as being dependent on an allowable base claim.

CONCLUSION

Based on the arguments presented above, Applicant respectfully asserts that Claims 1-23 overcome the rejections of record and, therefore, Applicant respectfully solicits allowance of these Claims.

Applicant has reviewed the following references which were cited but not relied upon and does not find these reference to show or suggest the present claimed invention: US 6,286,001, US 6,014,135, US 6,311,207, US 6,363,434 and US 6,513,116.

The Examiner is invited to contact Applicant's undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,

WAGNER, MURABITO & HAO L.L.P.

Dated: 20 June, 2003

Matthew J. Blecher
Registration No. 46,558

Two North Market Street
Third Floor
San Jose, CA 95113
(408) 938-9060